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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CENTRO EUROPA BUILDING, SUITE 417
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SAN JUAN, PR 00907-4127

August 3, 2006

Mr. Christopher Penny
East Vieques Remedial Project Manager
Installation Restoration Section
Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Boulevard
Norfolk, VA 23508-1278

Re: Review of the Draft Former Vieques Navy Training Range Live Impact Area Prescribed Burn Plan, Vieques, Puerto Rico

Dear Mr. Penny:

The U.S. Environmental Protection Agency (EPA) has completed the review of the Draft Former Vieques Navy Training Range Live Impact Area Prescribed Burn Plan, Vieques, Puerto Rico dated January 2006. Enclosed you will find our comments.

If you have any questions or comments, please contact me at (787) 741-5201.

Sincerely yours,

Daniel Rodriguez
Remedial Project Manager
Enforcement and Superfund Branch

Enclosure

cc: Yarissa Martinez, EQB, w/ encl.
Felix Lopez, FWS, w/ encl.
Richard Henry, FWS, w/ encl.
John Tomik, CH2M Hill, w/ encl.

EPA comments on the
Draft Former Vieques Navy Training Range Live Impact Area Prescribed Burn Plan,
***Former Vieques Naval Training Range (VNTR),* Vieques, Puerto Rico**
dated January 2006

GENERAL COMMENTS

1. The Draft Former Vieques Navy Training Range Live Impact Area Prescribed Burn Plan (hereinafter referred to as the Draft Burn Plan) uses a number of acronyms and abbreviations throughout the document that are not defined therein. While it is true that many of these acronyms and abbreviations are common use in the military/explosive ordnance disposal (EOD)/unexploded ordnance (UXO) contracting community, the document will very likely be read by a number of persons who are not members of this community. It is essential that these acronyms and abbreviations be defined at an appropriate location in the Draft Burn Plan or at their first use. This undefined usage is particularly obvious in Table 1-2, Munitions Items reported to Have Been Fired at the Former VNTR (page 3). Some of the undefined acronyms and/or abbreviations used there are: HE, TP, WP, HEAT, Heat, HEDP, A/C, MK, BLU, AGM, BDU, LAW, and SMAW.

   Please include a table or section of acronyms and abbreviations at an appropriate location in the Draft Burn Plan. If this is not considered appropriate, please ensure that each acronym and abbreviation is defined at its first use in the Draft Burn Plan.

SPECIFIC COMMENTS

1. **Section 2.6, Alternatives for Vegetation Removal, pages 6 and 7:** In the second bullet entitled "OPTION 2: Prescribed Burning," the third paragraph (Disadvantages) states that, "Vegetation tends to burn at high enough temperatures that any HE burned will be consumed with only very small (trace to non-detect levels) amounts of elements such as chromium, cadmium, and arsenic depending on the items in the work areas and the extent consumed by the burning. Residual contamination is usually non-detectable because of the distribution of the MEC items and the affects of heat or detonation (as opposed to an Open Burning/Open Detonation site where this activity is concentrated to a small area with multiple operations)." While the content of these somewhat difficult to understand sentences is very probably correct, it is unclear as to how the described results (trace to non-detect contamination and undetectable residual contamination) can be considered to be disadvantages of the prescribed burn process. In fact, they would appear to be secondary advantages of the process.

measure of worker safety. In areas of higher sub-munitions concentration, the alternative is to use engineering controls (fences and signage) to keep the area off-limits for public access." The second sentence is unclear as to whether the use of "fences and signage" to keep the area off-limits for public access is to be a permanent measure or will be temporary pending a removal action in these areas. Please revise the cited paragraph to state whether or not the noted procedure will be temporary or permanent.

5. **Section 3.2, Air Quality, page 9:** This section notes that an agricultural burn permit from Puerto Rico Environmental Quality Board might be applicable for this prescribed burn. Since these permits are designed for burning sugar cane and other crops, which do not traditionally contain a significant amount of CERCLA hazardous substances, this permit may not incorporate adequate protection of the public when exposed to air releases resulting from the burn. Please revise this section to describe the specific air monitoring and sampling, to include action levels, which will be utilized during this activity.

6. **Section 4.3, Prescribed Burning Controls, page 16:** Subsection 4.3.16 states that, "No persons are allowed to enter the area burned for 24 hours until the fire has been declared out." This sentence is unclear as written. Does this mean that the fire is "declared out" after 24 hours, or does it mean that entry will not be allowed until 24 hours after the fire has been "declared out?" Also Subsection 4.3.17 subsequently states that, "The burn manager in coordination with the range safety officer shall declared [sp] the fire out after a visual inspection of the area conducted at least 24 hours after ignition and all signs of flame and smoke have gone." This is unclear as to when the 24 hours time period begins. Is it 24 hours after ignition, or is it 24 hours after the fire is out? In addition, will the inspection be conducted by entering the burned area, or will it be conducted from outside the area by some unspecified means of observing the entire area? Please review these two somewhat difficult sections and revise them to clearly explain when the area may be entered after the fire. Also, please explain the inspection process to be used by the burn manager.